

**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**

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## *Liaison Counsel*

*[Additional Counsel Listed on Signature Page]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

BABAK HATAMIAN and LUSSU DENN  
SALVATORE, Individually and on Behalf of  
All Others Similarly Situated,

## Plaintiffs.

ADVANCED MICRO DEVICES, INC.,  
RORY P. READ, THOMAS J. SEIFERT,  
and LISA T. SU,

## Defendants

) Case No. 4:14-CV-00226-PJH  
)  
)  
**JOINT RESPONSE AND  
STIPULATION BY LEAD PLAINTIFF  
MOVANTS KBC ASSET  
MANAGEMENT NV AND ARKANSAS  
TEACHER RETIREMENT SYSTEM  
AND [PROPOSED] ORDER  
APPOINTING LEAD PLAINTIFF AND  
APPROVING LEAD PLAINTIFF'S  
SELECTION OF COUNSEL**  
)  
)  
**CLASS ACTION**  
)  
)  
DATE: April 23, 2014  
TIME: 9:00am  
DEPT.: Courtroom 3, 3rd Floor, Oakland  
JUDGE: Hon. Phyllis J. Hamilton  
)

1           WHEREAS, the above-captioned class action lawsuit *Hatamian v. Advanced Micro*  
 2 *Devices, Inc.*, No. 3:14-CV-00226-PJH (N.D. Cal.) (the “Action”) was filed on January 15,  
 3 2014 (ECF No. 1) and alleges violations of the federal securities laws on behalf of investors  
 4 who purchased the common stock of Advanced Micro Devices, Inc. (“AMD”) between  
 5 October 27, 2011 and October 18, 2012, inclusive (the “Class Period”);

6           WHEREAS, pursuant to Section 21(D)(a)(3)(A) of the Securities Exchange Act of  
 7 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(A), plaintiffs in the Action published a notice  
 8 on January 15, 2014, advising class members of their right to move the Court to serve as lead  
 9 plaintiff by March 17, 2014;

10          WHEREAS, on March 17, 2014, KBC Asset Management NV (“KBC”) timely filed a  
 11 motion to be appointed Lead Plaintiff in the Action and for the approval of its selection of the  
 12 law firm Motley Rice LLC (“Motley Rice”) as Lead Counsel and Lieff Cabraser Heimann &  
 13 Bernstein, LLP (“Lieff Cabraser”) as Liaison Counsel for the Class, ECF No. 9;

14          WHEREAS, on March 17, 2014, Arkansas Teacher Retirement System (“Arkansas  
 15 Teacher”) timely filed a motion to be appointed Lead Plaintiff in the Action and for approval  
 16 of its selection of the law firm Labaton Sucharow LLP (“Labaton Sucharow”) as Lead Counsel  
 17 and Berman DeValerio as Liaison Counsel for the Class, ECF No. 16;

18          WHEREAS, on March 17, 2014, Oklahoma Firefighters Pension and Retirement  
 19 System (“Oklahoma”) timely filed a motion to be appointed Lead Plaintiff in the Action and  
 20 for approval of its selection of the law firm Bernstein Liebhard LLP as Lead Counsel and  
 21 Glancy Binkow & Goldberg LLP as Liaison Counsel for the Class, ECF No. 14;

22          WHEREAS, in the days following the filing of the respective lead plaintiff motions,  
 23 counsel for KBC, Arkansas Teacher, and Oklahoma conveyed their clients’ interest in  
 24 resolving the pending motions amicably and without providing fodder for defendants or  
 25 forcing the Court to expend its limited resources on this issue;

26          WHEREAS, KBC and Arkansas Teacher agree that an informal resolution of the  
 27 motions is appropriate and that it is in the best interests of the Class for the lead plaintiff  
 28 movants to amicably advance the litigation beyond this preliminary stage;

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JOINT RESP. AND STIP. BY MOVANTS KBC AND ARKANSAS TEACHER AND [PROPOSED] ORDER  
 APPOINTING LEAD PLF. AND APPROVING LEAD PLF.’S SELECTION OF COUNSEL  
 CASE NO. 3:14-CV-00226-PJH

1        WHEREAS, the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15  
2 U.S.C. § 78u-4(a)(3)(B)(iii), provides, *inter alia*, that the most adequate plaintiff to serve as  
3 lead plaintiff is, in the determination of the Court, the “person or group of persons” that has the  
4 largest financial interest in the relief sought by the class and otherwise satisfies the relevant  
5 requirements of Federal Rule of Civil Procedure 23. *See, e.g.*, *In re Cavanaugh*, 306 F.3d 726,  
6 729-30 (9th Cir. 2002);

7        WHEREAS, KBC reported a loss of \$823,849 from its transactions in AMD common  
8 stock during the Class Period, ECF No. 10-3;

9        WHEREAS, Arkansas Teacher reported a loss of \$621,014 from its transactions in  
10 AMD common stock during the Class Period, ECF No. 17-2;

11       WHEREAS, Oklahoma reported a loss of \$134,677 from its transactions in AMD  
12 common stock during the Class Period, ECF No. 15-3;

13       WHEREAS, counsel for KBC and Arkansas Teacher has conferred with counsel for  
14 Oklahoma, which does not oppose this stipulation and supports the appointment of KBC and  
15 Arkansas Teacher together as Lead Plaintiff, and the selection of Motley Rice and Labaton  
16 Sucharow together as Lead Counsel and Lieff Cabraser as Liaison Counsel for the Class;

17       WHEREAS, in addition to having the greatest financial interests in the Action, KBC  
18 and Arkansas Teacher also “otherwise satisf[y] the requirements of Rule 23 of the Federal  
19 Rules of Civil Procedure.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(cc), ECF Nos. 9 at 7-10, 16 at 8-  
20 9.

21       IT IS HEREBY STIPULATED and AGREED, subject to the Court’s approval, as  
22 follows:

23       1. Pursuant to 15 U.S.C. § 78u-4(a)(3)(B), KBC and Arkansas Teacher are  
24 appointed to serve as Lead Plaintiff in this Action; and

25       2. Pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v), Lead Plaintiff’s selection of Motley  
26 Rice LLP and Labaton Sucharow as Lead Counsel for the Class and Lieff Cabraser as Liaison  
27 Counsel is approved.

*/s/ Joy A. Kruse*  
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and [Proposed] Co-Lead Counsel for Class*

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*Counsel for Arkansas Teacher Retirement System  
and [Proposed] Lead Counsel for Class*

**IT IS SO ORDERED.**

The Honorable Phyllis J. Kuhl  
United States District Court, Northern District of California



JOINT RESP. AND STIP. BY MOVANTS KBC AND ARKANSAS TEACHERS AND [PROPOSED] ORDER  
APPOINTING LEAD PLF. AND APPROVING LEAD PLF.'S SELECTION OF COUNSEL  
CASE NO. 3:14-CV-00226-PJH